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Indianapolis

Kathryn R. Koch, A.C.A.S.

Baltimore

David A. Palmer, C.F.E.

September 27, 2016

Matt Lombardo
 MVP Health Insurance Company
 625 State Street
 Schenectady, NY 12305

Re: MVP Health Plan, Inc.
 1Q/2Q 2017 Vermont Large Group HMO Rate Filing
 SERFF Tracking #: MVPH-130720563
 Objection #1

Dear Mr. Lombardo:

The following additional information is required for this filing.

General Information

1. We note that the increases in administrative loads and demographic factors are increases to the rates, and are not reflected in the proposed 1.1% increase per quarter. Please quantify the rate impact of all proposed changes that would change premium revenue for a group relative to the approved 4Q16 rates.

Demographic Adjustments

2. Please explain why it is appropriate to apply both trend and a re-normalization of the demographic factors to a block with no experience. While we understand that the factors are consistent with the PPO filing, this methodology appears to conflict with MVP's stated objective of "increasing the approved 4th quarter 2016 manual rates by one quarter of projected trend."

Non-Benefit Expenses

3. Please explain why the 2% of premium taxes included in the prior year's experience-rated addendum, and in the recently filed PPO filing, was removed in this filing.

Please be aware that we expect to have further questions regarding the filing as the review continues.

To ensure that the review of your filing has been completed before statutory deadlines, we expect you to respond as expeditiously as possible, but no later than October 5, 2016.

We trust that you understand these forms may not be used in Vermont until they are formally approved by the GMCB.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Ruggeberg', written over a horizontal line.

Kevin Ruggeberg, ASA, MAAA
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